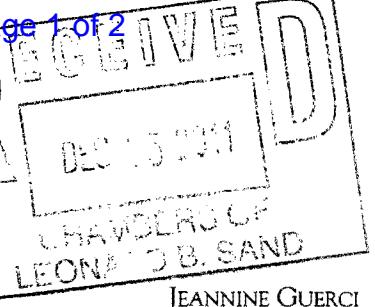


THE QUINN LAW FIRM
ATTORNEYS AT LAW

CROSSWEST OFFICE CENTER
399 KNOLLWOOD ROAD, SUITE 220
WHITE PLAINS, NEW YORK 10603

ANDREW C. QUINN
ROSA LUNA-MOLÉ*
BRUNO V. GIOFFRE, JR.†
ANTHONY J. DIFIORE*
JOHN D'ALESSANDRO

(914) 997-0555
FAX (914) 997-0550



JEANNINE GUERCI
OFFICE MANAGER

*MEMBER NY & NJ BAR

†MEMBER NY, CT & FL BAR

*MEMBER NY & CT BAR

December 13, 2011

VIA REGULAR MAIL

Honorable Leonard B. Sand
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, New York 10007

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: <u>12-20-11</u>

Re: New York City District Council of Carpenters Pension Fund et al.
v. Michael Forde et al. (Michael Vivenzio)
Docket No. 11-CV-5474

Dear Judge Sand:

Please be advised that The Quinn Law Firm has been retained to represent Mr. Michael Vivenzio. Enclosed herewith is our Notice of Appearance which was filed electronically. We write respectfully, on behalf of Mr. Vivenzio and with consent of opposing counsel, Mr. Harlan Silverstein, to request an extension until January 13, 2012 to submit an answer on our client's behalf to the First Amended Complaint.

On October 31, 2011, our client was served with a copy of the Summons and Complaint, with his Answer due November 21, 2011. Shortly thereafter, the undersigned, contacted Mr. Silverstein to request an extension of time to answer on Mr. Vivenzio's behalf as we needed additional time to meet with the client who is currently incarcerated in Brooklyn Metropolitan Detention Center and be formally retained.

Since that time, we had the opportunity to meet with Mr. Vivenzio and have been formally retained. However, on November 30, 2011, our client was served with a First Amended Complaint. Therefore, we plan on meeting with Mr. Vivenzio over the next few weeks to prepare his answer to the First Amended Complaint.

Therefore, in light of the foregoing, we respectfully request until January 13, 2012, to file an answer to the First Amended Complaint on behalf of Mr. Vivenzio. This is our first request for such an extension.

Thank you for your consideration.

MEMO ENDORSED

Very truly yours,

The Quinn Law Firm

Bruno V. Giuffre/BG

Bruno V. Giuffre, Jr., Esq.

Cc: Harlan J. Silverstein, Esq.
Attorneys for Plaintiffs
Kauff McGuire & Margolis LLP
950 Third Avenue, 14th Floor
New York, New York 10022

Dino J. Lombardi, Esq.
Attorneys for Defendant Michael Forde
Lombardi & Salerno PLLC
52 Duane Street, 7th Floor
New York, New York 10007

James R. Froccaro, Jr., Esq.
Attorney for Defendant Brian Hayes
7 Old Shore Road
Port Washington, New York 11050

Niall Mac Giollabhui, Esq.
Attorneys for Defendants Gerard McEntee & James Duffy
Law Office of Johnathan R. Sennett, P.C.
169 Main Street, PO Box 459
New Paltz, New York 12561

Joseph Ruocco – Pro Se
447 Rolling Hill Way
East Stroudsberg, PA 18302

*Extemaniganted
to 1/13/2012 as
requested.
Dorothy
B. Giuffre
12/20/2011*

MEMO ENDORSED